

### REMARKS

Claims 1-4, 11-13, 16-17, 23-28 are pending in this Application. The Applicant respectfully submits that neither Evans (U.S. Patent No. 6,672,881) or Smith (U.S. Patent No. 6,469,895) anticipate or make obvious the features of the pending claims as currently amended (or as originally filed).

The Applicant has amended independent Claims 1, 23 and 25 to include "*wherein said thermal management unit is to directly apply liquid coolant to said at least one electronic device within said chamber*" for the sole purpose to show that the thermal management unit is not a cold plate separated from the electronic device. The usage of the word "directly" in the claims and the specification is solely to point out that the liquid coolant is not physically separated from electronic device (e.g. IC package, etc.) by a wall. The usage of "to receive" in independent Claims 1, 23 is intended to have the same meaning as "capable of receiving" and is done merely for clarification purposes.

The Applicant respectfully submits that Smith and Evans do not qualify as appropriate prior art under 35 U.S.C. §102 as they do not disclose (expressly or inherently) all of the features of pending claims. In addition, the combination of Evans with Smith does not teach or suggest the combination of features in the Applicants' pending claims.

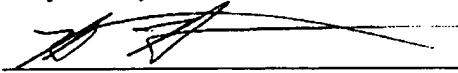
### CONCLUSION

In light of the foregoing amendments and remarks, early reconsideration and allowance of this application are most courteously solicited. It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except

USPTO Serial No. 6,933,671 (Docket No. ISOT-020)

as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Respectfully submitted,

  
\_\_\_\_\_  
Michael S. Neustel  
Reg. No. 41,221

12-8-05  
\_\_\_\_\_  
Date

NEUSTEL LAW OFFICES, LTD  
2534 South University Drive, Suite No. 4  
Fargo, North Dakota 58103  
Telephone: (701) 281-8822  
Facsimile: (701) 237-0544  
e-mail: [michael@neustel.com](mailto:michael@neustel.com)